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Attorney for Plaintiff

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 ZAN KORBA, individually, a Nevada
14 Resident,

Plaintiff,

15 vs.

16 THE HARTFORD UNDERWRITERS
17 INSURANCE COMPANY, a foreign
insurance company; DOES I through 100,
18 inclusive; and ROE CORPORATIONS I
through 100; inclusive,
19 Defendants.

CASE NO. 2:12-cv-01391-GMN-PAL

**REQUEST FOR EXPEDITED BRIEFING
SCHEDULE**

20 Plaintiff, Zan Korba, respectfully submits the instant request for an expedited briefing schedule
21 and hearing date for his Countermotion for Protective Order, which is submitted jointly with his
22 Opposition to Hartford's Motion for Protective Order, ECF No. 51.

23 **I. INTRODUCTION**

24 The parties have a pending discovery dispute regarding the appropriate scope of a Rule 30(b)(6)
25 deposition of Defendant Hartford. The parties have already agreed to an expedited briefing schedule on
26 that matter, which was approved and ordered by this Court, ECF 49. The hearing for that motion has
27 been set for September 19, 2013. ECF No. 49.
28

1 **II. PROPOSED SCHEDULE**

2 Hartford has noticed the Continued Deposition of Plaintiff Zan Korba for September 24, 2013.
3 As set forth in Plaintiff's Opposition and Countermotion, Plaintiff is seeking protection and/or limitation
4 on that deposition. As the hearing on Hartford's Motion for Protective Order is set for September 19,
5 2013, Plaintiff proposes using that same hearing date to decide its Motion for Protective Order.
6 Accordingly, Plaintiff proposes using the following briefing schedule:

- 7 1. Plaintiff will file its Countermotion on Friday, September 6, 2013
- 8 2. Hartford's Opposition will be due on September 13, 2013
- 9 3. Plaintiff's Reply will be due on September 17, 2013
- 10 4. The hearing of Plaintiff's Countermotion for Protective Order will take place on
11 September 19, 2013 at 9:00, jointly with the hearing on Hartford's Motion for Protective
Order.

12 In the event that the Court is unable to hear this matter based on the briefing schedule above,
13 Plaintiff requests that the Court revise the Briefing schedule as necessary to accommodate a hearing
14 prior to the September 24, 2013 deposition.

15 DATED this 6th day of September, 2013.

16 HALL JAFFE & CLAYTON, LLP

17 By /s/ Michael R. Hall
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22 **ORDER**

23
24 **IT IS SO ORDERED:**

25
26 
UNITED STATES MAGISTRATE JUDGE

27 DATED: September 10, 2013

CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify under penalty of perjury that I am an employee of HALL JAFFE & CLAYTON, LLP, and that on the 6th day of September, 2013, the foregoing **REQUEST FOR EXPEDITED BRIEFING SCHEDULE** was served upon the parties via the Court's e-filing and service program addressed as follows:

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An Employee of
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